

Leisure

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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KAMMAS & COMPANY, INC.,

Plaintiff,

STIPULATION AND ORDER
OF WITHDRAWAL OF COUNSEL

v.

No. 07 CV 3469 (PKL.)

ONE WORLD CAPITAL GROUP, LLC,

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned, that the appearance of Winston & Strawn LLP, 200 Park Avenue, New York, New York 10166, and as counsel for defendant One World Capital Group LLC is withdrawn. It is further stipulated and agreed that the deadlines set forth in the case management plan and scheduling order, dated July 26, 2007 are hereby extended by 45 days.

Dated: New York, New York
December 12, 2007

WINSTON & STRAWN LLP

By: Edward C. Wipper
Edward C. Wipper

200 Park Avenue
New York, New York 10166
(212) 294-6700

DROHAN, LEE & KELLEY LLP

By: Vivian R. Drohan
Vivian R. Drohan

One Penn Plaza
New York, New York 10019
(212) 710-0000

SO ORDERED

12/13/07
Peter K. Leisure
Honorable Peter K. Leisure
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
KAMMAS & COMPANY, INC.,
:
Plaintiff, : No. 07 CV 3469 (PKL)
:
v.
:
ONE WORLD CAPITAL GROUP, LLC, :
:
Defendant. :
----- x

DECLARATION IN SUPPORT OF ORDER OF WITHDRAWAL OF COUNSEL

I, EDWARD C. WIPPER, hereby affirm under penalty of perjury:

1. I am a member of the bar of the State of New York and of this Court and an associate at the law firm of Winston & Strawn LLP. I submit this affirmation pursuant to Rule 1.4 of the Local Rules of this Court in support of the request of Winston & Strawn LLP to withdraw its appearance as counsel for defendant One World Capital Group LLC.

2. Since the inception of this action, Edward C. Wipper and Timothy J. Rivelli of Winston & Strawn LLP, have been attorneys of record for One World Capital Group. During recent weeks, an adversity of interest has arisen between another of Winston & Strawn LLP's clients and One World Capital Group. One World Capital Group has agreed to allow Winston & Strawn to withdraw as counsel and has requested a 45-day extension of the Case Management Plan and Scheduling Order so that it may retain new counsel. Counsel for Plaintiff has consented to this request.

3. This case is still at the early stages. A Case Management Plan and Scheduling Order was entered by the Court on July 26, 2007. On October 1, 2007, One World

Capital Group served Initial Disclosures and Document Requests on the Plaintiff. On November 1, 2007, One World Capital Group LLC served interrogatories pursuant to Local Rule 33.3(a). Plaintiff has not yet served any discovery nor has Plaintiff replied to Defendant's discovery requests. Discovery is scheduled to close on April 30, 2008.

4. No trial date has been set in this case.
5. This withdrawal and extension are consented to by all counsel of record and are made with the client's permission.

WHEREFORE, I respectfully request that the Court so order the annexed Stipulation to withdraw Winston & Strawn LLP as attorneys for defendant One World Capital Group LLC and to extend the deadlines in the current Case Management Plan and Scheduling Order by 45 days.

Dated: December 12, 2007
New York, New York

WINSTON & STRAWN LLP

By: Edward C. Wipper
Edward C. Wipper

200 Park Avenue
New York, New York 10166
(212) 294-6700